

WEIL, GOTSHAL & MANGES LLP

Richard W. Slack (*pro hac vice*)
(richard.slack@weil.com)

Jessica Liou (*pro hac vice*)
(jessica.liou@weil.com)

Matthew Goren (*pro hac vice*)
(matthew.goren@weil.com)

767 Fifth Avenue
New York, NY 10153-0119
Tel: 212 310 8000
Fax: 212 310 8007

KELLER BENVENUTTI KIM LLP

Jane Kim (#298192)
(jkim@kbbkllp.com)

David A. Taylor (#247433)
(dtaylor@kbbkllp.com)

Thomas B. Rupp (#278041)
(trupp@kbbkllp.com)

650 California Street, Suite 1900
San Francisco, CA 94108
Tel: 415 496 6723
Fax: 650 636 9251

Attorneys for Debtors and Reorganized Debtors

**UNITED STATES BANKRUPTCY COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION**

In re:

PG&E CORPORATION,

- and -

**PACIFIC GAS AND ELECTRIC
COMPANY,**

Debtors.

- ☐ Affects PG&E Corporation
☐ Affects Pacific Gas and Electric Company
☒ Affects both Debtors

** All papers shall be filed in the Lead Case, No. 19-30088 (DM).*

Bankruptcy Case No. 19-30088 (DM)
Chapter 11
(Lead Case)
(Jointly Administered)

**SCHEDULING STIPULATION REGARDING
THE AMENDED MOTION FOR RELIEF
FROM ORDERS BY DEFAULT
DISALLOWING AND EXPUNGING PROOFS
OF CLAIMS PURSUANT TO
REORGANIZED DEBTORS' ELEVENTH
AND THIRTEENTH SECURITIES CLAIMS
OMNIBUS OBJECTIONS (CLAIMS
BARRED BY THE STATUTE OF REPOSE)**

[Related to Dkt. Nos. 11216, 11315, 11498,
11601, 11734, 11735, 11867]

PG&E Corporation and Pacific Gas and Electric Company, as debtors and reorganized debtors (collectively, the “**Debtors**” or “**Reorganized Debtors**”) in the above-captioned chapter 11 cases (the “**Chapter 11 Cases**”), on the one hand, and DRRT as the duly appointed claims filing representative for individual claimants Bayerninvest Kapitalverwaltungsgesellschaft MBH, Credit Suisse Funds AG, Deka Investment GMBH, Giam Generali Insurance Asset Management, Helaba Invest Kapitalanlagegesellschaft MBH, Internationale Kapitalanlagegesellschaft MBH, Kaiser Permanente, Metzler Asset Management GMBH, Swiss Reinsurance Company Ltd., UBS Fund Management (Switzerland) AG, UBS Fund Management Luxembourg S.A., Meag Munich Ergo Kapitalanlagegesellschaft MBH (collectively, the “**DRRT Claimants**”, and, together with the Debtors and the Reorganized Debtors, the “**Parties**”), on the other hand, by and through their respective counsel, hereby stipulate and agree as follows:

RECITALS

A. On January 29, 2019 (the “**Petition Date**”), the Debtors commenced the Chapter 11 Cases in the United States Bankruptcy Court for the Northern District of California (the “**Bankruptcy Court**”).

B. On December 21, 2021, DRRT filed the *Amended Motion for Relief from Orders by Default Disallowing and Expunging Proofs of Claims Pursuant to Reorganized Debtors’ Eleventh and Thirteenth Securities Claims Omnibus Objections (Claims Barred by the Statute of Repose)* [Dkt. No. 11734] (the “**Motion**”). DRRT noticed the hearing for January 18, 2022 (the “**Hearing**”). See Dkt. No. 11735.

C. On December 27, 2021, the Parties filed the *Scheduling Stipulation Regarding the Amended Motion for Relief From Orders by Default Disallowing and Expunging Proofs of Claims Pursuant to Reorganized Debtors’ Eleventh and Thirteenth Securities Claims Omnibus Objections (Claims Barred by the Statute of Repose)* [Dkt. No. 11749], by which the Parties stipulated and agreed to briefing deadlines and set a hearing date of February 15, 2022 at 10:00 am (Pacific Time).

D. On January 25, 2022, the Reorganized Debtors filed the *Reorganized Debtors’ Opposition to the DRRT Claimants’ Motion for Reconsideration* [Dkt. No. 11867].

1 E. DRRT requested that the hearing date be postponed and the Reorganized Debtors are
2 agreeable to that request and therefore the Parties seek to revise the hearing date as set forth below.

3 **NOW, THEREFORE, IT IS HEREBY STIPULATED AND AGREED, BY AND**
4 **BETWEEN THE PARTIES, THROUGH THE UNDERSIGNED, AND THE PARTIES**
5 **JOINTLY REQUEST THE BANKRUPTCY COURT TO ORDER, THAT:**

- 6 1. The Hearing shall be set for March 15, 2022 at 10:00 a.m. (Pacific Time).
7 2. This Stipulation may be executed in counterparts, each of which shall be deemed an
8 original but all of which together shall constitute one and the same agreement.
9 3. The Bankruptcy Court shall retain jurisdiction to resolve any disputes or controversies
10 arising from this Stipulation or any Order approving the terms of this Stipulation.

11
12 Dated: February 10, 2022

13 WEIL, GOTSHAL & MANGES LLP

14
15 /s/ Richard W. Slack

16 Richard W. Slack

17 *Attorneys for Debtors and*
18 *Reorganized Debtors*

Dated: February 10, 2022

MEYER LAW GROUP LLP

15 /s/ Brent D. Meyer

16 Brent D. Meyer

17 *Attorneys for the DRRT Claimants*